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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

UNITED STATES OF AMERICA,

3:23-cv-00453-MO

Plaintiff,

v.

**UNOPPOSED MOTION TO STAY
PROCEEDINGS**

**\$396,172.61 IN U.S. CURRENCY FROM
FOUR (4) JP MORGAN CHASE BANK
ACCOUNTS;**

**ALL FUNDS CONTAINED WITHIN SIX
(6) CHARLES SCHWAB BROKERAGE
ACCOUNTS;**

**ONE 2022 TESLA MODEL Y, VIN
7SAYGDEE3NF315820, ITS TOOLS
AND APPURTENANCES; and**

**FIVE (5) REAL PROPERTIES WITH
BUILDINGS, APPURTENANCES, AND
IMPROVEMENTS, *in rem*,**

Defendants.

The government hereby moves this court, pursuant to 18 U.S.C. § 981(g)(1), to stay all further proceedings in this case pending resolution of the criminal investigation related to the seizure of all defendants, *in rem*, and the Claimant, Nicole Shelby Randall.

Pursuant to Local Rule 7-1(a), counsel for the government has contacted Daniel Grande, attorney for the sole claimant, Nicole Shelby Randall, in this civil forfeiture matter. Ms. Randall filed a claim and answer in this matter, and she has no objection to the requested stay. (ECF Nos. 9, 12).

There is a pending criminal investigation that is directly related to the forfeiture allegations in this case and to Ms. Randall. A stay is therefore necessary while the criminal investigation is ongoing, as civil discovery would adversely affect the government's ability to conduct the related criminal investigation. Mr. Grande has similarly confirmed that Ms. Randall does not yet wish to engage in discovery at this time given the related criminal investigation, as it could burden her right against self-incrimination as contemplated in 18 U.S.C. § 981(g)(2). Because the criminal investigation may take some time to resolve, the government proposes filing a status report with this Court on May 2, 2024 (approximately six months).

DATED: November 2, 2023.

Respectfully submitted,

NATALIE K. WIGHT
United States Attorney

s/ Katherine C. De Villiers
KATHERINE C. DE VILLIERS
Assistant United States Attorney